

**Asbestos SNUR – screening Anonymous submitter comments (only) in regulations.gov
Sorting by ID Number (A-Z) [=ascending comment number] from ID #0003 to #1809
Begun 8/17/18 @ 9:45 am, [1,807 results shown by regs.gov] - Peter G.**

Out of approximately 1,627 anonymous public comments currently posted to the docket, these 8 are the only ones I found that say something other than unqualified opposition to the proposed rule.

ID numbers EPA-HQ-OPPT-2018-0159-xxxx

0010

In Section IX. Economic Analysis, only the cost of submitting and prepare the SNUN and a user fee are included. It is foreseeable any SNUN for asbestos could go through extensive follow-up investigation due to the health concern of the material and public perception of the asbestos use. The overall economic cost for business should include additional data gathering, testing, and health study of using asbestos in the proposed categories. It is reported that EPA is considering additional access fees for risk evaluation (<https://chemicalwatch.com/64007/us-epa-highest-fees-for-risk-evaluation-of-existing-chemicals>) and the proposed rule listed here (<https://www.federalregister.gov/d/2018-02928>). It is recommended the proposed rule to include additional information regarding the economic cost related to SNUN for asbestos, which could be significantly higher than the number indicated in the report. A more realistic economic analysis could allow business and public is to make a more informed decision when looking at any potential new uses of asbestos

0317

“Only seems to make sense for missile use, otherwise the lifecycle of the material used will fall outside of the EPAs purview. Of course use of a schedule 3??? Chemical in missiles/military weapons probably has CWC impacts which do not appear to be addressed whatever in the proposed rule.”

1027

As I read this rule, it actually tightens/restricts the ability of expanding the use of asbestos by requiring EPA approval prior to import or use in these no longer produced products. I would strongly encourage that if anyone does make this request it not be allowed, but overall, it seems that this rule is a good improved restriction on the use. Some comments see this as a roll back, which I believe is a misinterpretation of the rule and the result of some news articles that have perpetuated this misinterpretation. It would be good to get a clarification of the rule that is a bit easier to follow and understand.

1167

Good afternoon

Aside from all the hysterical comments against your proposed rule, I think this new use rule deserves to be explored and where justified enacted.

My rationale for this is based on a long history of familiarity with the substance and the belief that it has more beneficial attributes to industry and technical applications than it does to outlaw the stuff entirely.

When proper industrial hygiene and work practice controls are used, there is practically zero risk to workers or the public. Bonded asbestos substrates have been used for generations in all types of building products, such as floor tiles, siding etc. and as long as the materials were not friable and

airborne, there is zero risk to health.

I think the legal community, specifically those parties taking part in the Manville settlement, have done an admirable job in convincing the public that the slightest trace or mention of the 'A' word is akin to an Ebola outbreak, hence the mass hysteria and dis-information associated with the topic. Totally misinformed and entirely hyperbolic.

With all due respect , it will be very difficult to separate the hysteria and high emotional pitch in most of these public comments from the technical science and safety aspects of using this material, but I encourage your deliberation to take into consideration the legitimate commercial and industrial applications and use of the product- for which there are few viable alternative products.

Also, as a practicing Occupational Safety Professional, I am somewhat dismayed at the short window to offer comments on this issue, having only learned about it from a random article in a trade publication. A more informed audience would likely offer a better judgement on the actual merits of using the material. But I do support the use of the material in controlled and regulated applications, with appropriate warnings and precautions, technical training, PPE, etc.

And yes, I fully understand that a lot of preventable deaths occurred from uncontrolled exposure to the dust back in the day when it was used wildly uncontrolled, but then again, so was tobacco, until the health community got it into a box and controlled it.

As difficult as it is to say this, in the face of these pages and pages of unsubstantiated comments, I believe the use of asbestos in properly controlled applications will offer appreciably more good than harm, by a large measure, sufficient to justify moving ahead with your rule-making process.

I am a Certified Safety Professional (CSP) and hold an Associates Degree in Risk Management (ARM) I also teach the OSHA 10 and 30 Hour classes in Construction and teach technical safety classes at the University level.

While I have no doubt there are more capable technical experts on this issue, I think my appraisal is fair and sober, and reflects the science behind the use of this material, vs. emotional hysteria

1345

I have very little objection to the incorporation of asbestos into polymers where the fibers are prevented from becoming loose in the environment. Such products might include sheets of insulation board for retarding heat gain through walls and ceilings. The in-discriminant ways that asbestos was utilized in the past without the thought to ways of controlling the fibers from becoming airborne or water borne was a gigantic problem. To totally reject the use of asbestos without understanding that free asbestos fibers are the problem. There are methods available to prevent the fibers from becoming a problem through encapsulation. I therefore oppose the outright ban of the use of asbestos.

1370

This SNUR is an incremental step, a layer of regulation that serves as a weak watchdog while allowing new uses for asbestos. Asbestos is a thoroughly studied and well known carcinogen. A ban makes the most sense. Let asbestos be removed from all US manufacturing. Let asbestos be left behind as old

thinking. Clean up the 20th-century asbestos mess and prioritize public health and safety. Ban asbestos in all forms, for all uses.

1489

This would be good because it closes loopholes from before, but I am absolutely against not considering essential factors in the new reviews. 1) Not counting previous exposure can be deadly, if there is still asbestos in a building/material from before and new material is added that also includes asbestos you are essentially increasing the amount of the total asbestos exposure to anyone that comes in contact with it. 2) Not factoring in the risk of cancer to asbestos, I should not have to offer reasoning for that, we know that asbestos has lead to cancer, especially for firefighters. Please reconsider these items.

1660

The Environmental Protection Agency should extend public comment time for this important change. The EPA's planned approach for evaluating proposed "new uses" of asbestos ignores consulting pre-existing information on the uses of asbestos, despite the fact that the health risks associated with it have been widely documented.

The proposed change is not in the best interests of public health - clearly there have been millions spent in lawsuits stemming from cases where people were inadvertently exposed to asbestos. How much money has been spent removing asbestos from buildings due to its toxic properties? How many people have died from exposure to asbestos? Why doesnt the EPA strengthen a ban on this toxic substance? It seems the proposed change is based on financial motives - not science and facts. Why has import of asbestos increased this year? According to Newsweek, imports of asbestos has surged this year, four times the amount as the same period in 2017.

The EPA needs to focus on its mission to protect the environment. Not make it more toxic.